

December 30, 2011

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: NERC Full Notice of Penalty regarding West Penn Power Company, Monongahela Power Company, and The Potomac Edison Company, formerly d.b.a Allegheny Power, FERC Docket No. NP12-_-000

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding West Penn Power Company, Monongahela Power Company, and The Potomac Edison Company, formerly d.b.a Allegheny Power (collectively, WP/MP/PE), NERC Registry ID# NCR02602,² in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).³

On November 8, 2010, WP/MP/PE submitted two Self-Reports to ReliabilityFirst Corporation (ReliabilityFirst) stating WP/MP/PE violated (1) PRC-007-0 R1 by failing to ensure that its under frequency load shedding (UFLS) program was consistent with ReliabilityFirst's UFLS program

¹ *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). See also 18 C.F.R. Part 39 (2011). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). See 18 C.F.R. § 39.7(c)(2).

² ReliabilityFirst Corporation confirmed that Allegheny Power was included on the NERC Compliance Registry as a Distribution Provider (DP), Generator Owner (GO), Load Serving Entity (LSE), Purchasing-Selling Entity (PSE), and Transmission Owner (TO) on May 30, 2007. As a DP and TO, Allegheny Power is subject to the requirements of NERC Reliability Standards PRC-007-0 R1 and PRC-008-0 R2. The Settlement Agreement incorrectly applies this violation to Allegheny Power's LSE function as well.

³ See 18 C.F.R. § 39.7(c)(2).

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requirements and (2) PRC-008-0 R2⁴ by failing to implement the UFLS maintenance and testing program. This Notice of Penalty is being filed with the Commission because ReliabilityFirst and WP/MP/PE have entered into a Settlement Agreement to resolve all outstanding issues arising from ReliabilityFirst’s determination and findings of the violations⁵ of PRC-007-0 R1 and PRC-008-0 R2. According to the Settlement Agreement, WP/MP/PE neither admits nor denies the violations, but has agreed to the assessed penalty of forty thousand dollars (\$40,000), in addition to other remedies and actions to mitigate the instant violation and facilitate future compliance under the terms and conditions of the Settlement Agreement. Accordingly, the violations identified as NERC Violation Tracking Identification Numbers RFC201000677 and RFC201000672 are being filed in accordance with the NERC Rules of Procedure and the CMEP.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement executed on August 26, 2011, by and between ReliabilityFirst and WP/MP/PE, which is included as Attachment a. The details of the findings and basis for the penalty are set forth in the Settlement Agreement and herein. This Notice of Penalty filing contains the basis for approval of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (NERC BOTCC). In accordance with Section 39.7 of the Commission’s regulations, 18 C.F.R. § 39.7 (2007), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement, as discussed in greater detail below.

Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty (\$)
Reliability First Corporation	West Penn Power Company, Monongahela Power Company, and The Potomac Edison Company, formerly d.b.a Allegheny Power	NOC-967	RFC201000677	PRC-007-0	1	Medium	\$40,000
			RFC201000672	PRC-008-0	2	Medium	

⁴ In its Self-Report, WP/MP/PE stated a violation of PRC-008-0 R1. ReliabilityFirst determined that the facts and circumstances contained within the Self-Report reflected a violation of PRC-008-0 R2 rather than a violation of PRC-008-0 R1.

⁵ For purposes of this document, each violation at issue is described as a “violation,” regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

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PRC-007-0

The purpose statement of Reliability Standard PRC-007-0 provides: “Provide last resort System preservation measures by implementing an Under Frequency Load Shedding (UFLS) program.”

PRC-007-0 R1 provides: “The Transmission Owner and Distribution Provider, with a UFLS program (as required by its Regional Reliability Organization)^[6] shall ensure that its UFLS program is consistent with its Regional Reliability Organization’s UFLS program requirements.” (Footnote added.)

PRC-007-0 R1 has a “Medium” Violation Risk Factor (VRF) and a “Moderate” Violation Severity Level (VSL). The subject violation applies to WP/MP/PE’s Distribution Provider (DP) and Transmission Owner (TO) functions.

On November 8, 2010, WP/MP/PE submitted a Self-Report to *ReliabilityFirst* identifying a possible violation of PRC-007-0 R1. On October 15, 2010, as a result of an internal review of its UFLS devices, WP/MP/PE discovered that two UFLS relays were set at a frequency trip point below the amount required by the UFLS program. *ReliabilityFirst* requires that qualifying entities are able to shed 5.0% of their peak system load at 59.5 Hz.⁷ Because these two relays were set below the UFLS program expected trip point of 59.5 Hz, a total of 35 MW of expected load shed was not available at the 59.5 Hz step. However, because the UFLS program included excess load shedding for this step, the load shed amount was in fact only 24 MW below the required amount resulting in an amount of load that was 4.7% of the peak system load for this step.⁸

On February 1, 2011, WP/MP/PE discovered that one UFLS relay included in the UFLS program was removed from service in 2005. WP/MP/PE had continued to treat this UFLS relay as in service for purposes of their UFLS program and expected it to shed load at the 58.9 Hz step. Because this relay was unable to shed load, 37 MW of expected load shed was not available at the 58.9 Hz step. However, because the UFLS program included excess load shedding at the 58.9 Hz step, the resulting load shed amount was only 16 MW below the required amount resulting in an amount of load that was 4.8% of the peak system load for this step.

⁶ Consistent with applicable FERC precedent, the term “Regional Reliability Organization” in this context refers to *ReliabilityFirst*.

⁷ WP/MP/PE’s UFLS program must be in accordance with the East Central Area Reliability Coordination legacy documents.

⁸ WP/MP/PE peak system load was 7,860 MW (2010 UFLS Program), and it included excess load shedding. Therefore, WP/MP/PE was only capable of shedding 369 MW at the 59.5 Hz step, which is 24 MW below the 393 MW (which is 5.0% of 7,860 MW) required by *ReliabilityFirst*.

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As part of the Mitigation Plan for this violation, WP/MP/PE conducted a complete field inspection and test of all UFLS relays included in the UFLS program. In order to ensure timely reporting of the results, ReliabilityFirst requested WP/MP/PE to submit weekly progress reports of the inspection and testing.

On March 18, 2011, WP/MP/PE submitted the final results of their UFLS device inspection indicating the possible violation of PRC-007-0 R1 had again expanded in scope. WP/MP/PE discovered an additional UFLS relay at the 58.9 Hz step that would have failed to trip a particular transformer breaker, and therefore would have been incapable of shedding the load as reflected in their UFLS program. Because this transformer breaker would not have been tripped by the UFLS relay, the 58.9 Hz step load shed was an additional 13 MW below the expected UFLS program amount. The combination of this 13 MW with the 16 MW shortage identified above resulted in the 58.9 Hz step being 29 MW below the required load shed amount, or 4.6% of the peak system load for this step.

ReliabilityFirst determined that WP/MP/PE had a violation of PRC-007-0 R1 because it failed to ensure that its UFLS program was consistent with ReliabilityFirst's UFLS program requirements.

ReliabilityFirst determined the duration of the violation to be from June 18, 2007, the date WP/MP/PE was required to comply with PRC-007-0 R1, until April 29, 2011, the date WP/MP/PE modified its UFLS relays and updated its UFLS program to comply with ReliabilityFirst's UFLS program requirements.

ReliabilityFirst determined this violation posed a moderate risk to the reliability of the bulk power system (BPS). The risk of the violation to the reliability of the BPS was aggravated by the fact that WP/MP/PE's inability to shed the required amount of load at the 59.5 Hz step increased the likelihood that frequency would dip further, requiring other entities to compensate for the deficient entity's load and shed more themselves. Shedding load at the higher frequency set points increases the chance of arresting frequency decline without having to shed additional load unnecessarily. The risk to the reliability of the BPS was mitigated by the fact that because of excess load shed amounts in other frequency steps of the UFLS program, WP/MP/PE's total UFLS capability met 105.6% of the total load shed requirement. During a UFLS event, WP/MP/PE would have been capable of shedding excess load in other steps, which would have compensated for the deficiency of 29 MW at the 58.9 Hz step and the deficiency of 24 MW at the 59.5 Hz step. Furthermore, there were no UFLS events during the violation period.

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PRC-008-0

The purpose statement of Reliability Standard PRC-008-0 provides: “Provide last resort system preservation measures by implementing an Under Frequency Load Shedding (UFLS) program.”

PRC-008-0 R2 provides: “The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its Regional Reliability Organization and NERC on request (within 30 calendar days).” (Footnote added.)

PRC-007-0 R1 has a “Medium” VRF and a “Lower” VSL. The subject violation applies to WP/MP/PE’s DP and TO functions.

On November 8, 2010, WP/MP/PE submitted a Self-Report to *ReliabilityFirst* identifying a possible violation of PRC-008-0 R2. As a result of an internal review of Protection System devices, WP/MP/PE discovered a failure to maintain and test two of the 236 UFLS relays (0.8% of total) in accordance with the UFLS equipment maintenance and testing program (UFLS Program).

WP/MP/PE did not enter these UFLS relays into the WP/MP/PE maintenance tracking system when originally placed into service on February 11, 2005. As a result of this oversight, WP/MP/PE did not schedule maintenance and testing for these UFLS relays. *ReliabilityFirst* found that WP/MP/PE violated PRC-008-0 R2 by failing to implement the UFLS Program.

ReliabilityFirst determined that WP/MP/PE had a violation of PRC-008-0 R2 because it failed to implement the UFLS Program.

ReliabilityFirst determined the duration of the violation to be from January 1, 2010, the date WP/MP/PE should have tested the two identified UFLS devices pursuant to the UFLS Program, until September 28, 2010, the date WP/MP/PE maintained and tested the two identified UFLS devices.

ReliabilityFirst determined this violation posed a moderate risk to the reliability of the BPS. The risk to the reliability of the BPS was mitigated by the fact that the relays at issue trip 11.6 MW of load in the event that frequency drops below 59.0 Hz. WP/MP/PE is capable of shedding 49 MW in excess of the WP/MP/PE UFLS Program requirements offsetting the 11.6 MW of load associated with the two UFLS relays at issue in the violation. Therefore, if either of the two UFLS relays failed, WP/MP/PE’s UFLS Program would still have met their UFLS Program

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requirements. When WP/MP/PE tested the relays, it found them in working condition. However, the relays required a calibration adjustment.

Regional Entity's Basis for Penalty

According to the Settlement Agreement, ReliabilityFirst has assessed a penalty of forty thousand dollars (\$40,000) for the referenced violations. In reaching this determination, ReliabilityFirst considered the following factors: (1) ReliabilityFirst considered certain aspects of WP/MP/PE's compliance program as mitigating factors;⁹ (2) WP/MP/PE self-reported the violations; (3) WP/MP/PE and its affiliated companies have no prior violations of the same Reliability Standard requirement;¹⁰ (4) WP/MP/PE was cooperative throughout the compliance

⁹ Allegheny Power's internal compliance program was distributed to relevant WP/MP/PE employees through a SharePoint website. Allegheny Power developed this site to establish, maintain and update compliance documentation, as well as post schedules and provide a location to develop comments for Reliability Standards under development. Allegheny Power held annual meetings to review compliance efforts for the upcoming year, which were attended by standard owners and direct supervisors, as well as senior WP/MP/PE management. Allegheny Power's corporate compliance officer was in the senior level of corporate management, and had independent access to the CEO and board of directors. Allegheny Power continually reviewed its compliance program, and conducted training to introduce new compliance requirements or to reinforce existing requirements. WP/MP/PE reviewed its internal compliance program on a continual basis. WP/MP/PE also conducted an internal review of 50% of the applicable standards on a biennial schedule. Allegheny introduced "Sign-Off Letters" for Standard Owners and management in order to encourage accountability. Additionally, WP/MP/PE retained external consultants to assist in strengthening their process for documentation and evidence gathering related to compliance with the Reliability Standards. ReliabilityFirst also notes that at the time of the violation, WP/MP/PE was not yet a wholly-owned subsidiary of FirstEnergy Corp. and, as a result, ReliabilityFirst's consideration of Allegheny Power's compliance program did not extend to analysis of FirstEnergy Corp.'s compliance program.

¹⁰ On December 12, 2010, Jersey Central Power & Light Company (JCPL), an affiliate of FirstEnergy Corp., submitted a Self-Report to ReliabilityFirst identifying a possible violation of PRC-007-0 R1 (RFC201000695). FirstEnergy Corp.'s acquisition of Allegheny Power, which included the acquisition of WP/MP/PE, occurred on February 25, 2011, and followed the occurrence of the violations by WP/MP/PE described in the Settlement Agreement. Therefore, ReliabilityFirst did not consider the violation by JCPL, which is being concurrently filed (NOC-972), as an aggravating factor in the penalty determination for the purposes of this Settlement Agreement. A Settlement Agreement covering one violation of PRC-005-1 R2 for JCPL (NOC-632) was filed with FERC under NP11-52-000 on November 30, 2010. On December 30, 2010, FERC issued an order stating it would not engage in further review of the Notice of Penalty. A Settlement Agreement covering two violations of PRC-005-1 R2.1 for Allegheny Energy Supply Company, L.L.C. (NCR02600) (NOC-780) was filed with FERC under NP11-186-000 on May 26, 2011. On June 24, 2011, FERC issued an order stating it would not engage in further review of the Notice of Penalty. A Settlement Agreement covering two violations of PRC-005-1 R2.1 for Allegheny Power (NOC-651) was filed with FERC under NP11-110-000 on February 23, 2011. On March 25, 2011, FERC issued an order stating it would not engage in further review of the Notice of Penalty. A Settlement Agreement covering violations of EOP-004-1 R3 and FAC-003-1 R1 for Allegheny Power (NOC-413) was filed with FERC under NP10-85-000 on March 31, 2010. On April 30, 2010, FERC issued an order stating it would not engage in further review of the Notice of Penalty. A Settlement Agreement covering violations of PRC-005-1 R2.1 and FAC-008-1 R1 for Monongahela Power Company (NCR10200) (NOC-563) was filed with FERC under NP10-177-000 on September 30, 2010. On October 29, 2010, FERC issued an order stating it would not engage in further review of the Notice of Penalty. ReliabilityFirst

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enforcement process; (5) there was no evidence of any attempt to conceal a violation nor evidence of intent to do so; and (6) ReliabilityFirst determined that the violations did not pose a serious or substantial risk to the reliability of the BPS.

After consideration of the above factors, ReliabilityFirst determined that, in this instance, the penalty amount of forty thousand dollars (\$40,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violations.

Status of Mitigation Plan¹¹

PRC-007-0

WP/MP/PE's Mitigation Plan to address the violation of PRC-007-0 R1 was submitted to ReliabilityFirst on February 17, 2011 with a proposed completion date of April 30, 2011. The Mitigation Plan was accepted by ReliabilityFirst on February 18, 2011 and approved by NERC on March 16, 2011. The Mitigation Plan for this violation is designated as MIT-07-3417 and was submitted as non-public information to FERC on March 17, 2011 in accordance with FERC orders.

WP/MP/PE's Mitigation Plan required WP/MP/PE to:

1. Conduct a complete field inspection and test of all UFLS relays included in the UFLS program;
2. Verify underfrequency relay information is complete and accurate;
3. Ensure relays in service have frequency trip settings consistent with the relay setting order and UFLS program;
4. Confirm WP/MP/PE ownership and operational control of the relay;
5. Conduct as found and as left testing of the relay to confirm settings; and
6. Revise the UFLS program to include change management controls that confirm all documentation is revised when WP/MP/PE makes program changes. In order to ensure timely reporting of the results, ReliabilityFirst requested WP/MP/PE to submit weekly progress reports of the inspection and testing. ReliabilityFirst created a spreadsheet to capture WP/MP/PE's results.

determined that these prior violations should not serve as a basis for aggravating the penalty because they involved a standard that is not the same or similar to the instant standards. Moreover, there was nothing in the record to suggest that broader corporate issues were implicated.

¹¹ See 18 C.F.R § 39.7(d)(7).

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WP/MP/PE certified on July 15, 2011 that the above Mitigation Plan requirements were completed on April 29, 2011. As evidence of completion of its Mitigation Plan, WP/MP/PE submitted the following:

1. *RFC201000677 -Completion Record.pdf* provided details of all the Mitigation Plan milestones including correction of the two load shed deficiencies, verification of all relays in the UFLS program, removal of UFLS relays not under WP/MP/PE ownership and operational control and the procedure that includes change management.

On August 10, 2011, after reviewing WP/MP/PE's submitted evidence, ReliabilityFirst verified that WP/MP/PE's Mitigation Plan was completed on April 29, 2011 with respect to PRC-007-0 R1.

PRC-008-0

WP/MP/PE's Mitigation Plan to address the violation of PRC-008-0 R2 was submitted to ReliabilityFirst on February 10, 2011 with a proposed completion date of April 30, 2011. The Mitigation Plan was accepted by ReliabilityFirst on February 18, 2011 and approved by NERC on March 16, 2011. The Mitigation Plan for this violation is designated as MIT-07-3416 and was submitted as non-public information to FERC on March 17, 2011 in accordance with FERC orders.

WP/MP/PE's Mitigation Plan required WP/MP/PE to:

1. Complete maintenance and testing of the two identified UFLS devices;
2. Modify its UFLS Program to help ensure that WP/MP/PE properly documents all additions or changes to UFLS devices; and
3. Conduct a field assessment of all UFLS devices.

WP/MP/PE certified on August 3, 2011 that the above Mitigation Plan requirements were completed on March 31, 2011. As evidence of completion of its Mitigation Plan, WP/MP/PE submitted the following:

1. *RFC201000672 -Completion Record.pdf* provided details of all the Mitigation Plan milestones including testing and maintenance of the two UFLS devices.

On September 12, 2011, after reviewing WP/MP/PE's submitted evidence, ReliabilityFirst verified that WP/MP/PE's Mitigation Plan was completed on March 31, 2011 with respect to PRC-008-0 R2.

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Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed¹²

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,¹³ the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on November 1, 2011. The NERC BOTCC approved the Settlement Agreement, including ReliabilityFirst's assessment of a forty thousand dollar (\$40,000) financial penalty against WP/MP/PE and other actions to facilitate future compliance required under the terms and conditions of the Settlement Agreement. In approving the Settlement Agreement, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

In reaching this determination, the NERC BOTCC considered the following factors:

1. WP/MP/PE self-reported the violations;
2. ReliabilityFirst reported that WP/MP/PE was cooperative throughout the compliance enforcement process;
3. WP/MP/PE had a compliance program at the time of the violations which ReliabilityFirst considered a mitigating factor;
4. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
5. ReliabilityFirst determined that the violations did not pose a serious or substantial risk to the reliability of the BPS; and
6. ReliabilityFirst reported that there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

For the foregoing reasons, the NERC BOTCC approved the Settlement Agreement and believes that the assessed penalty of forty thousand dollars (\$40,000) is appropriate for the violations and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

¹² See 18 C.F.R. § 39.7(d)(4).

¹³ *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008); *North American Electric Reliability Corporation*, "Further Guidance Order on Reliability Notices of Penalty," 129 FERC ¶ 61,069 (2009); *North American Electric Reliability Corporation*, "Notice of No Further Review and Guidance Order," 132 FERC ¶ 61,182 (2010).

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Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30 day period following the filing of this Notice of Penalty with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

Attachments to be Included as Part of this Notice of Penalty

The attachments to be included as part of this Notice of Penalty are the following documents:

- a) Settlement Agreement by and between ReliabilityFirst and WP/MP/PE executed August 26, 2011, included as Attachment a;
 - a. WP/MP/PE's Self-Report for PRC-007-0 R1 dated November 8, 2010, included as Attachment A to the Settlement Agreement;
 - b. WP/MP/PE's Self-Report Addendum for PRC-007-0 R1 dated February 9, 2011, included as Attachment B to the Settlement Agreement;
 - c. ReliabilityFirst's Results Spreadsheet for PRC-007-0 R1 dated March 18, 2011, included as Attachment C to the Settlement Agreement;
 - d. WP/MP/PE's Mitigation Plan designated as MIT-07-3417 for PRC-007-0 R1 submitted February 17, 2011, included as Attachment D to the Settlement Agreement;
 - e. WP/MP/PE's Certification of Mitigation Plan Completion for PRC-007-0 R1 dated July 15, 2011, included as Attachment E to the Settlement Agreement;
 - f. ReliabilityFirst's Verification of Mitigation Plan Completion for PRC-007-0 R1 executed August 10, 2011, included as Attachment F to the Settlement Agreement.
 - g. WP/MP/PE's Self-Report for PRC-008-0 R2 dated November 8, 2010, included as Attachment G to the Settlement Agreement; and
 - h. WP/MP/PE's Mitigation Plan designated as MIT-07-3416 for PRC-008-0 R2 submitted February 10, 2011, included as Attachment H to the Settlement Agreement.
- b) WP/MP/PE's Certification of Mitigation Plan Completion for PRC-008-0 R2 dated August 3, 2011, included as Attachment b; and
- c) ReliabilityFirst's Verification of Mitigation Plan Completion for PRC-008-0 R2 executed September 12, 2011, included as Attachment c.

A Form of Notice Suitable for Publication¹⁴

A copy of a notice suitable for publication is included in Attachment d.

¹⁴ See 18 C.F.R § 39.7(d)(6).

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Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:

<p>Gerald W. Cauley President and Chief Executive Officer North American Electric Reliability Corporation 3353 Peachtree Road NE Suite 600, North Tower Atlanta, GA 30326-100 (404) 446-2560</p> <p>David N. Cook* Senior Vice President and General Counsel North American Electric Reliability Corporation 1325 G Street, N.W., Suite 600 Washington, DC 20005 (202) 400-3000 david.cook@nerc.net</p> <p>Hugh Conley* Manager, Reliability Compliance Allegheny Power 76 South Main Street Akron, OH 44308 (330) 761-4460 hconley@alleghenyenergy.com</p> <p>Mark Koziel* Consultant Allegheny Power 76 South Main Street Akron, OH 44308 (330) 761-4416 makoziel@firstenergycorp.com</p>	<p>Rebecca J. Michael* Associate General Counsel for Corporate and Regulatory Matters North American Electric Reliability Corporation 1325 G Street, N.W. Suite 600 Washington, DC 20005 (202) 400-3000 rebecca.michael@nerc.net</p> <p>Robert K. Wargo* Director of Enforcement and Regulatory Affairs ReliabilityFirst Corporation 320 Springside Drive, Suite 300 Akron, OH 44333 (330) 456-2488 bob.wargo@rfirst.org</p> <p>L. Jason Blake* Corporate Counsel ReliabilityFirst Corporation 320 Springside Drive, Suite 300 Akron, OH 44333 (330) 456-2488 jason.blake@rfirst.org</p> <p>Michael D. Austin* Associate Attorney ReliabilityFirst Corporation 320 Springside Drive, Suite 300 Akron, OH 44333 (330) 456-2488 mike.austin@rfirst.org</p>
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<p>Robert Mattiuz* Director, FERC Compliance Allegheny Power 76 South Main Street Akron, OH 44308 (330) 384-2407 rmattiu@alleghenypower.com</p> <p>Mark Pavlick* Consultant Allegheny Power 76 South Main Street Akron, OH 44308 (330) 761-7861 mpavlick@firstenergycorp.com</p> <p>Anne M. Juterbock* Attorney Allegheny Power 76 South Main Street Akron, OH 44308 (330) 374-6550 (330) 384-3875 – facsimile ajuterbock@firstenergycorp.com</p> <p>William Smith* Staff Compliance Specialist Allegheny Power 76 South Main Street Akron, OH 44308 (330) 384-2415 wsmith1@alleghenyenergy.com</p>	<p>*Persons to be included on the Commission’s service list are indicated with an asterisk. NERC requests waiver of the Commission’s rules and regulations to permit the inclusion of more than two people on the service list.</p>
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Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations and orders.

Respectfully submitted,

/s/ Rebecca J. Michael

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and Regulatory Matters
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cc: West Penn Power Company, Monongahela Power Company, and The Potomac Edison
Company, formerly d.b.a Allegheny Power
ReliabilityFirst Corporation

Attachments

Attachment a

**Settlement Agreement by and between
Reliability *First* and WP/MP/PE executed
August 26, 2011**



<i>In re:</i> ALLEGHENY POWER)	Docket Nos. RFC201000677; and
)	RFC201000672
)	
NERC Registry ID No. NCR02602)	NERC Reliability Standards:
)	PRC-007-0, Requirement 1; and
)	PRC-008-0, Requirement 2

**SETTLEMENT AGREEMENT
BETWEEN
RELIABILITYFIRST CORPORATION
AND
WEST PENN POWER COMPANY, MONONGAHELA POWER COMPANY
AND THE POTOMAC EDISON COMPANY**

I. INTRODUCTION

1. ReliabilityFirst Corporation (“ReliabilityFirst”) and the entities registered on the NERC Compliance Registry as Allegheny Power (“West Penn Power Company, Monongahela Power Company and The Potomac Edison Company” or collectively, “WP/MP/PE”), all formerly doing business as Allegheny Power, enter into this Settlement Agreement (“Agreement”) to resolve alleged violations by WP/MP/PE of Reliability Standards PRC-007-0, Requirement 1 and PRC-008-0, Requirement 2.
2. WP/MP/PE are wholly-owned, indirect subsidiaries of FirstEnergy Corp. (“FirstEnergy”), a public utility holding company controlling 39 power plants with a total generating capacity of approximately 24,000 MW, and transmission and distribution systems that serve retail and wholesale customers in Ohio, Pennsylvania, Maryland, New Jersey, New York, West Virginia, and Virginia. WP/MP/PE’s transmission system service area consists of over 4,600 circuit miles of transmission lines and a peak system load of approximately 8,700 MW.
3. ReliabilityFirst confirmed that WP/MP/PE are registered as “Allegheny Power” on the North American Electric Reliability Corporation (“NERC”) Compliance Registry as a Distribution Provider, Load Serving Entity, and Transmission Owner for all three legal entities formerly doing business as “Allegheny Power.” In their capacities as Distribution Providers and Transmission Owners, WP/MP/PE are subject to compliance with PRC-008-0, R2, and, in their

capacities as Distribution Providers, Load Serving Entities, and Transmission Owners, WP/MP/PE are subject to compliance with PRC-007-0, R1.

4. WP/MP/PE and ReliabilityFirst agree and stipulate to this Agreement in its entirety. The facts stipulated herein are stipulated solely for the purpose of resolving between WP/MP/PE and ReliabilityFirst the subject matter of this Agreement and do not constitute admissions or stipulations for any other purpose. WP/MP/PE neither admit nor deny that the facts stipulated herein constitute violations of Reliability Standards PRC-007-0, R1 and PRC-008-0, R2.

II. ALLEGED VIOLATIONS

A. Alleged Violation of PRC-007-0, R1 (RFC201000677)

5. PRC-007-0, R1 states:

R1. The Transmission Owner and Distribution Provider, with a UFLS program (as required by its Regional Reliability Organization) shall ensure that its UFLS program is consistent with its Regional Reliability Organization's UFLS program requirements.

6. On November 8, 2010, WP/MP/PE submitted a self report to ReliabilityFirst identifying a possible violation of PRC-007-0, R1. See Violation Self-Reporting Form (attached as **Attachment A**). WP/MP/PE are required to comply with ReliabilityFirst's underfrequency load shedding ("UFLS") program requirements.
7. On October 15, 2010, as a result of an internal review of their UFLS devices, WP/MP/PE discovered that two UFLS relays were set at a frequency trip point below the amount required by the UFLS Program. ReliabilityFirst requires that qualifying entities are able to shed 5.0% of their peak system load at 59.5 Hz.¹ Because these two relays were set below the UFLS Program expected trip point of 59.5 Hz, a total of 35 MW of expected load shed was not available at the 59.5 Hz step. However, because the UFLS Program included excess load shedding for this step, the load shed amount was in fact only 24 MW below the required amount resulting in an amount of load that was 4.7% of the peak system load for this step.²
8. On February 1, 2011, WP/MP/PE discovered that one UFLS relay included in their UFLS Program was removed from service in 2005. On February 9, 2011, WP/MP/PE submitted a self report update indicating that the possible violation of

¹ WP/MP/PE's UFLS Program must be in accordance with the East Central Area Reliability Coordination legacy documents.

² WP/MP/PE peak system load was 7,860 MW (2010 UFLS Program), and it included excess load shedding. Therefore, WP/MP/PE was only capable of shedding 369 MW at the 59.5 Hz step, which is 24 MW below the 393 MW (which is 5.0% of 7,860 MW) required by ReliabilityFirst.

PRC-007-0, R1 expanded in scope. *See* February 9, 2011 Letter (attached as **Attachment B**). WP/MP/PE had continued to treat this UFLS relay as in service for purposes of their UFLS Program and expected it to shed load at the 58.9 Hz step. Because this relay was unable to shed load, 37 MW of expected load shed was not available at the 58.9 Hz step. However, because the UFLS Program included excess load shedding at the 58.9 Hz step, the resulting load shed amount was only 16 MW below the required amount resulting in an amount of load that was 4.8% of the peak system load for this step.³

9. As part of the mitigation plan for this alleged violation, WP/MP/PE conducted a complete field inspection and test of all UFLS relays included in the UFLS program. In order to ensure timely reporting of the results, *ReliabilityFirst* requested WP/MP/PE to submit weekly progress reports of the inspection and testing. *ReliabilityFirst* created a spreadsheet to capture WP/MP/PE's results. *See* AP PRC 007 Update Spreadsheet_0318811 FINAL (attached as **Attachment C**).
10. On March 18, 2011, WP/MP/PE submitted the final results of their UFLS device inspection indicating the possible violation of PRC-007-0, R1 had again expanded in scope. WP/MP/PE discovered an additional UFLS relay at the 58.9 Hz step that would have failed to trip a particular transformer breaker, and therefore would have been incapable of shedding the load as reflected in their UFLS Program. Because this transformer breaker would not have been tripped by the UFLS relay, the 58.9 Hz step load shed was an additional 13 MW below the expected UFLS Program amount. The combination of this 13 MW with the 16 MW shortage identified in paragraph 8 above resulted in the 58.9 Hz step being 29 MW below the required load shed amount, or 4.6% of the peak system load for this step.
11. *ReliabilityFirst* alleges that WP/MP/PE violated PRC-007-0, R1 by failing to ensure that their UFLS Program is consistent with *ReliabilityFirst's* requirements.

Risk Considerations and Violation Duration

12. PRC-007-0, R1 has a Violation Risk Factor ("VRF") of "Medium," consistent with the VRF Matrix promulgated by NERC. Applying the Violation Severity Level ("VSL") Matrix promulgated by NERC, *ReliabilityFirst* determined that the facts and circumstances of this violation warranted a "Moderate" VSL.
13. PRC-007-0 provides integral last resort system preservation measures by requiring implementation of a UFLS program. The risk of the alleged violation to the reliability of the bulk electric system was aggravated by the fact that

³ WP/MP/PE was only capable of shedding 377 MW at the 58.9 Hz step including the missing load as well as WP/MP/PE excess load shed capability, which is 16 MW below the 393 MW (which is 5.0% of 7,860 MW) required by *ReliabilityFirst*.

WP/MP/PE's inability to shed the required amount of load at the 59.5 Hz step increased the likelihood that frequency would dip further, requiring other entities to compensate for the deficient entity's load and shed more themselves. Shedding load at the higher frequency set points increases the chance of arresting frequency decline without having to shed additional load unnecessarily.

14. Despite the foregoing, the risk to the reliability of the bulk electric system was mitigated by the fact that because of excess load shed amounts in other frequency steps of the UFLS Program, WP/MP/PE's total UFLS capability met 105.6% of the total load shed requirement. During a UFLS event, WP/MP/PE would have been capable of shedding excess load in other steps, which would have compensated for the deficiency of 29 MW at the 58.9 Hz step and the deficiency of 24 MW at the 59.5 Hz step.
15. In light of the nature of the alleged violation, offset by the aforementioned mitigating factors, ReliabilityFirst determined that this alleged violation posed a moderate risk to the reliability of the bulk electric system.
16. The duration of this alleged violation is from June 18, 2007, the date WP/MP/PE incorrectly set the frequency trip point of the UFLS devices in their UFLS Program, until April 29, 2011, the date WP/MP/PE revised their UFLS Program to comply with ReliabilityFirst's requirements.

Mitigating Actions

17. On February 17, 2011, WP/MP/PE submitted to ReliabilityFirst their mitigation plan to address the alleged violation of PRC-007-0, R1. *See*, WP/MP/PE Mitigation Plan No. MIT-07-3417 (attached as **Attachment D**). ReliabilityFirst accepted this mitigation plan on February 18, 2011, and on March 16, 2011, NERC approved it. NERC submitted the mitigation plan to the Federal Energy Regulatory Commission (the "Commission") on March 17, 2011, as confidential, non-public information.
18. In this mitigation plan, WP/MP/PE memorialized the actions it took to address the alleged violation of PRC-007-0, R1. WP/MP/PE conducted a field inventory of all UFLS relays included in the WP/MP/PE UFLS Program. During this field inventory, WP/MP/PE: (1) verified underfrequency relay information is complete and accurate; (2) ensured relays in service have frequency trip settings consistent with the relay setting order and UFLS Program; (3) confirmed WP/MP/PE ownership and operational control of the relay; and (4) conducted as found and as left testing of the relay to confirm settings. WP/MP/PE also revised their UFLS Program to include change management controls that confirm all documentation is revised when WP/MP/PE makes program changes.
19. On July 15, 2011, WP/MP/PE submitted to ReliabilityFirst a certification of completion for this mitigation plan, which stated that WP/MP/PE completed this

mitigation plan as of April 29, 2011. *See* Certification of Mitigation Plan Completion (attached as **Attachment E**). On August 10, 2011, ReliabilityFirst verified this completion. *See* Verification of Mitigation Plan Completion for MIT-07-3417 (attached as **Attachment F**).

B. Alleged Violation of PRC-008-0, R2 (RFC201000672)

20. PRC-008-0, R2 states:

R2. The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its Regional Reliability Organization and NERC on request (within 30 calendar days).

21. On November 8, 2010, WP/MP/PE submitted a self report to ReliabilityFirst identifying a possible violation of PRC-008-0, R1.⁴ *See* Violation Self-Reporting Form (attached as **Attachment G**). As a result of an internal review of their Protection System devices, WP/MP/PE discovered they did not maintain and test two of its 236 UFLS relays (0.8%) in accordance with their UFLS maintenance and testing program (the “UFLS Maintenance Program”).

22. WP/MP/PE did not enter these UFLS relays into the WP/MP/PE maintenance tracking system when it placed them into service on February 11, 2005. As a result of this oversight, WP/MP/PE did not schedule maintenance and testing for these UFLS relays.

23. ReliabilityFirst alleges that WP/MP/PE violated PRC-008-0, R2 by failing to implement their UFLS Maintenance Program.

Risk Considerations and Violation Duration

24. PRC-008-0, R2 has a VRF of “Medium,” consistent with the VRF Matrix promulgated by NERC. Applying the VSL Matrix promulgated by NERC, ReliabilityFirst determined that the facts and circumstances of this violation warranted a “Lower” VSL.

25. The risk to the bulk electric system was mitigated by the following factors. The relays at issue in this alleged violation trip 11.6 MW of load in the event that frequency drops below 59.0 Hz. WP/MP/PE is capable of shedding 49 MW in excess of the WP/MP/PE UFLS Program requirements, which offsets the 11.6 MW of load associated with the two UFLS relays at issue in the alleged violation.

⁴ ReliabilityFirst determined that the facts and circumstances contained within the self report reflected a violation of PRC-008-0, R2 rather than a violation of PRC-008-0, R1.

Therefore, if either of the two UFLS relays failed, WP/MP/PE's UFLS Program would still have met their UFLS Program requirements. When WP/MP/PE tested the relays, it found them in working condition. However, the relays required a calibration adjustment.

26. In light of the nature of the alleged violation, offset by the aforementioned mitigating factors, ReliabilityFirst determined that this alleged violation posed a moderate risk to the reliability of the bulk electric system.
27. The duration of this alleged violation is from January 1, 2010, the date by which WP/MP/PE should have tested the two UFLS devices pursuant to their UFLS Maintenance Program, until September 28, 2010, the date WP/MP/PE maintained and tested the UFLS devices.

Mitigating Actions

28. On February 10, 2011, WP/MP/PE submitted to ReliabilityFirst their mitigation plan to address the alleged violation of PRC-008-0, R2. See, WP/MP/PE Mitigation Plan No. MIT-07-3416 (attached as **Attachment H**). ReliabilityFirst accepted this mitigation plan on February 18, 2011, and on March 16, 2011, NERC approved it. NERC submitted the mitigation plan to the Commission on March 17, 2011, as confidential, non-public information.
29. In this mitigation plan, WP/MP/PE memorialized the actions they took to address the alleged violation of PRC-008-0, R2. WP/MP/PE maintained and tested the two UFLS devices upon discovery of the alleged violation. WP/MP/PE will modify their UFLS Program to help ensure that WP/MP/PE properly documents all additions or changes to UFLS devices. Additionally, WP/MP/PE conducted a field assessment of all UFLS devices.
30. WP/MP/PE shall certify and provide evidence demonstrating the completion of the mitigation plan to ReliabilityFirst by August 15, 2011. In accordance with the NERC CMEP, ReliabilityFirst will verify WP/MP/PE's completion of this mitigation plan and promptly report its successful completion to NERC.

III. ADJUSTMENT FACTORS

31. In addition to the above paragraphs, which are incorporated herein by reference, ReliabilityFirst considered the following factors.
32. At the time of the alleged violations, WP/MP/PE were wholly-owned subsidiaries of Allegheny Energy, Inc. ("Allegheny"), a public utility holding company. On February 25, 2011, Allegheny and its affiliates were acquired by FirstEnergy. Because the alleged violations occurred prior to such acquisition by FirstEnergy, ReliabilityFirst considered certain aspects of Allegheny's compliance program as mitigating factors. For instance, Allegheny's internal compliance program was distributed to relevant WP/MP/PE employees through a SharePoint website.

Allegheny developed this site to establish, maintain, and update compliance documentation, as well as post schedules and provide a location to develop comments for Reliability Standards under development. Allegheny held annual meetings to review compliance efforts for the upcoming year, which were attended by standard owners and direct supervisors, as well as senior WP/MP/PE Management.

33. Allegheny's Corporate Compliance Officer was in the senior level of corporate management, and had independent access to the CEO and Board of Directors. Allegheny continually reviewed its compliance program, and conducted training, as required, to introduce new compliance requirements or to reinforce existing requirements.
34. WP/MP/PE reviewed their internal compliance program on a continual basis. WP/MP/PE also conducted an internal review of 50% of the applicable standards on a biennial schedule. Allegheny introduced "Sign-Off Letters" for Standard Owners and management in order to encourage accountability. Additionally, WP/MP/PE retained external consultants to assist in strengthening their process for documentation and evidence gathering related to compliance with the Reliability Standards.
35. ReliabilityFirst also notes that at the time of the alleged violation, WP/MP/PE were not yet FirstEnergy affiliates and, as a result, ReliabilityFirst's consideration of Allegheny's compliance program did not extend to analysis of FirstEnergy's compliance program.
36. ReliabilityFirst considered the fact that WP/MP/PE self reported the alleged violations as a mitigating factor. Internal controls and self reports of possible violations assist ReliabilityFirst's mission of improving reliability of the bulk electric system.
37. When assessing the penalty for the alleged violation at issue in this Agreement, ReliabilityFirst considered whether the facts of these alleged violations evidenced any (a) repeated or continuing conduct similar to that underlying a prior violation of the same or a closely related Reliability Standard Requirement; (b) conduct addressed in any previously submitted mitigation plan for a prior violation of the same or a closely-related Reliability Standard Requirement; or (c) multiple violations of the same Standard and Requirement. WP/MP/PE does not have any prior violations of the same or a closely related Reliability Standard Requirements.⁵

⁵ On December 12, 2010, Jersey Central Power & Light ("JCPL"), an affiliate of FirstEnergy Corp., submitted a self report to ReliabilityFirst identifying a possible violation of PRC-007-0, R1 (RFC201000695). FirstEnergy's acquisition of Allegheny, which included the acquisition of WP/MP/PE, occurred on February 25, 2011, and followed the occurrence of the alleged violations by WP/MP/PE described in this Agreement. Therefore, ReliabilityFirst did not consider the alleged violation by JCPL as an aggravating factor in the penalty determination for the purposes of this Agreement.

IV. MONETARY PENALTY

38. Based upon the foregoing, WP/MP/PE collectively shall pay a monetary penalty of \$40,000 to ReliabilityFirst.
39. ReliabilityFirst shall present an invoice to WP/MP/PE within 20 days after the Agreement is approved by the Commission or affirmed by operation of law. Upon receipt, WP/MP/PE shall have 30 days to remit payment. ReliabilityFirst will notify NERC if it does not timely receive the payment.
40. If WP/MP/PE fails to timely remit the monetary penalty payment to ReliabilityFirst, interest will commence to accrue on the outstanding balance, pursuant to 18 C.F.R. § 35.19a(a)(2)(iii), on the earlier of (a) the 31st day after the date on the invoice or (b) the 51st day after the Agreement is approved by the Commission or operation of law.

V. ADDITIONAL TERMS

41. ReliabilityFirst and WP/MP/PE agree that this Agreement is in the best interest of bulk electric system reliability. The terms and conditions of the Agreement are consistent with the regulations and orders of the Commission and the NERC Rules of Procedure.
42. ReliabilityFirst shall report the terms of all settlements of compliance matters to NERC. NERC will review the Agreement for the purpose of evaluating its consistency with other settlements entered into for similar violations or under similar circumstances. Based on this review, NERC will either approve or reject this Agreement. If NERC rejects the Agreement, NERC will provide specific written reasons for such rejection and ReliabilityFirst will attempt to negotiate with WP/MP/PE a revised settlement agreement that addresses NERC's concerns. If a settlement cannot be reached, the enforcement process shall continue to conclusion. If NERC approves the Agreement, NERC will (a) report the approved settlement to the Commission review and approval by order or operation of law and (b) publicly post the alleged violation and the terms provided for in this Agreement.
43. This Agreement shall become effective upon the Commission's approval of the Agreement by order or operation of law. WP/MP/PE expressly waives their rights to any hearing or appeal concerning any matter set forth herein, unless any NERC or Commission action constitutes a material modification to this Agreement.
44. ReliabilityFirst reserves all rights to initiate enforcement actions against WP/MP/PE in accordance with the NERC Rules of Procedure in the event that WP/MP/PE fails to comply with any of the terms or conditions of this Agreement, including failure to timely complete mitigation plans or other remedies of this

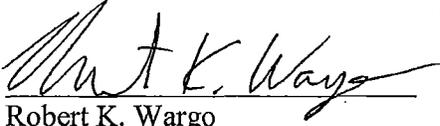
Agreement. In the event WP/MP/PE fail to comply with any of the terms or conditions of this Agreement, *ReliabilityFirst* may initiate an action or actions against WP/MP/PE to the maximum extent allowed by the NERC Rules of Procedure, including, but not limited to, the imposition of the maximum statutorily allowed monetary penalty. WP/MP/PE will retain all rights to defend against such action or actions in accordance with the NERC Rules of Procedure.

45. WP/MP/PE consents to *ReliabilityFirst*'s future use of this Agreement for the purpose of assessing the factors within the NERC Sanction Guidelines and applicable Commission orders and policy statements, including, but not limited to, the factor evaluating WP/MP/PE's history of violations. Such use may be in any enforcement action or compliance proceeding undertaken by NERC or any Regional Entity or both, provided however that WP/MP/PE does not consent to the use of the conclusions, determinations, and findings set forth in this Agreement as the sole basis for any other action or proceeding brought by NERC or any Regional Entity or both, nor does WP/MP/PE consent to the use of this Agreement by any other party in any other action or proceeding.
46. WP/MP/PE affirms that all of the matters set forth in this Agreement are true and correct to the best of their knowledge, information, and belief, and that it understands that *ReliabilityFirst* enters into this Agreement in express reliance on the representations contained herein, as well as any other representations or information provided by WP/MP/PE to *ReliabilityFirst* during any interaction between WP/MP/PE and *ReliabilityFirst* relating to the subject matter of this Agreement.
47. Each of the undersigned warrants that he or she is an authorized representative of the entity designated below, is authorized to bind such entity, and accepts the Agreement on the entity's behalf.
48. The signatories to this Agreement agree that they enter into this Agreement voluntarily and that, other than the recitations set forth herein, no tender, offer, or promise of any kind by any member, employee, officer, director, agent, or representative of *ReliabilityFirst* or WP/MP/PE has been made to induce the signatories or any other party to enter into this Agreement.
49. The Agreement may be signed in counterparts.
50. This Agreement is executed in duplicate, each of which so executed shall be deemed to be an original.

[SIGNATURE PAGE TO FOLLOW]

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Agreed to and accepted:



Robert K. Wargo
Director of Enforcement & Regulatory Affairs
ReliabilityFirst Corporation

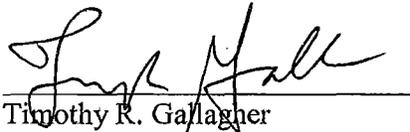
8/22/2011
Date



Robert R. Mattiuz, Jr.
Director, FERC Compliance
On behalf of West Penn Power Company,
Monongahela Power Company, and
The Potomac Edison Company

8/26/2011
Date

Approved:



Timothy R. Gallagher
President & Chief Executive Officer
ReliabilityFirst Corporation

8/22/11
Date

Attachment d
Notice of Filing

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

West Penn Power Company, Monongahela Power
Company, and The Potomac Edison Company,
formerly d.b.a Allegheny Power

Docket No. NP12-____-000

NOTICE OF FILING
December 30, 2011

Take notice that on December 30, 2011, the North American Electric Reliability Corporation (NERC) filed a Notice of Penalty regarding West Penn Power Company, Monongahela Power Company, and The Potomac Edison Company, formerly d.b.a Allegheny Power in the Reliability *First* Corporation region.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211, 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. Such notices, motions, or protests must be filed on or before the comment date. On or before the comment date, it is not necessary to serve motions to intervene or protests on persons other than the Applicant.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at <http://www.ferc.gov>, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, D.C. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: [BLANK]

Kimberly D. Bose,
Secretary